

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DEFENDANT'S MOTION TO FILE UNDER SEAL**  
**HARVARD'S FEB. 29, 2016 LETTER**

Pursuant to Local Rule 7.2 and the Stipulated Protective Order (ECF No. 55), Defendant President and Fellows of Harvard College (“Harvard”) hereby moves this Honorable Court for an order sealing Harvard’s February 29, 2016 letter in response to the Court’s invitation at the February 25, 2016 status conference to provide additional information concerning certain database fields. Harvard’s letter specifically describes information that Harvard has produced in this litigation and designated as Confidential and Highly Confidential – Attorneys’ Eyes Only pursuant to the Stipulated Protective Order (ECF No. 53).

Harvard is delivering unredacted courtesy copies of all of these materials to the Court in a sealed envelope. Harvard requests that the documents subject to this Motion be impounded until further order of the Court. In the event this Court has not previously ordered otherwise, Harvard’s submission should be returned to its undersigned counsel upon resolution of this matter. Pursuant to Local Rule 7.1(a)(2), Harvard conferred with SFFA in a good faith effort to resolve or narrow the issues involved in this motion. SFFA was made aware of this motion before filing.

WHEREFORE, Harvard respectfully requests that the Court grant this motion and allow Harvard's February 29, 2016 letter to be filed under seal and to be viewed only by the Judge, her clerk(s), and Court personnel in conjunction with Harvard's motion to stay.

Respectfully submitted,

*/s/ Felicia H. Ellsworth*

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Dated: February 29, 2016

*Counsel for Defendant President and  
Fellows of Harvard College*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(a), I hereby certify that Harvard has conferred with Students for Fair Admissions' counsel in a good faith attempt to resolve or narrow the issues involved in this motion.

*/s/ Felicia H. Ellsworth*  
Felicia H. Ellsworth

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system. The attachments to this motion were delivered to the Court in a sealed envelope.

*/s/ Felicia H. Ellsworth*  
Felicia H. Ellsworth

**EXHIBIT 1**

Attachment To Be Filed Pending

Proposed Motion to File Under Seal